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February 25, 2009

John L. Clark

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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 9300 East Hampton Drive Capitol Heights, MD 20743

Re: EB Docket 06-36; Annual CPNI Certification

Dear Ms. Dortch:

Submitted herewith is the calendar-year 2008 CPNI certification of Sun Microwave, Inc. (FRN 0013605241) pursuant to 47 C.F.R. § 64.2009(e). Please advise me if there are any questions regarding this submission.

Respectfully submitted,

John L. Clark

Counsel for Sun Microwave, Inc.

cc: Enforcement Bureau; Best Copy

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## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Sun Microwave, Inc. FRN: 0013605241

I, Albert R. Pfeltz, certify that I am an officer of Sun Microwave, Inc. (the "Company"), am authorized to make this certification on its behalf, and that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934 and the Federal Communications Commission rules implementing Section 222.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 24.2001 *et seq.* of the Commission's rules.

The Company did not take any actions (proceedings instituted or petitions filed by the company at either state commission, the court system, or at the Commission) against data brokers during calendar-year 2008.

The Company has no information with respect to processes that pretexters are using in attempts to access CPNI. The steps the Company is taking to protect CPNI are described in the attached statement.

The Company did not receive any customer complaints during calendar-year 2008 concerning the unauthorized release of CPNI

Title: Vice President

Dated: February 25, 2009

## STATEMENT OF COMPLIANCE PROCEDURES

Sun Microwave, Inc. (the "Company") has established operating procedures to protect the privacy of Customer Proprietary Network Information ("CPNI") as follows:

- (1) The Company does not allow the use of CPNI for sales or marketing of any category of service or product other than that which it already provides to the customer.
- (2) The Company does not provide access to CPNI through customer-initiated telephone contact. If a customer contacts the Company by telephone seeking information that is proprietary to the customer, the Company will provide such information only by return call to the customer's telephone number of record or by mail addressed to the customer at its service address. The Company does not provide on-line access to customer account or other proprietary information. In the rare event that an individual purporting to represent the customer were to visit the Company's business location seeking disclosure of CPNI, the Company would contact the customer for verification that the individual is authorized to represent the customer if the individual was not already personally known to the Company and would require a proper photo i.d.
- (3) Except as set forth above, the Company discloses CPNI to third parties only pursuant to lawful process. In the event of any uncertainty, the Company's policy is to consult with counsel before responding to any request for CPNI from a third party.
- (4) In the event of any breach in the security of customers' CPNI, the Company will notify law enforcement pursuant to the FCC's rules before notifying customers or publicly disclosing the breach. In addition, the Company will maintain records of all such breaches and notifications as required by the FCC's rules.
- 2) The Company has trained all personnel who have access to CPNI, or control over access to CPNI, regarding the uses for which CPNI may be made, the restrictions in the use of CPNI, and the authentication requirements for disclosure of CPNI to customers, and all personnel have been trained in the notification procedures to be followed in the event of a breach. The Company has a no tolerance policy for violations and will discipline any individual who has been found in violation of CPNI requirements. Intentional or grossly-negligent violations will result in termination. In other cases, discipline, up to and including termination, will apply, as appropriate.

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